

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on February 9, 2016.

Permit Number: **R30-07300003-2016**
Application Received: **February 11, 2016**
Plant Identification Number: **03-54-07300003**
Permittee: **CYTEC Industries, Inc.**
Facility Name: **Willow Island Plant**
Manufacturing Unit: **Polymer Additives (Part 2 of 3)**
Mailing Address: **1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM01* Revised: *August 2, 2016*

Physical Location: Willow Island, Pleasants County, West Virginia
UTM Coordinates: 474.00 km Easting • 4,356.00 km Northing • Zone 17
Directions: From Interstate 77, Exit 179, take State Route 2 north for approximately 10 miles. Plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

Facility Description

CYTEC Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi-process chemical plant at Willow Island, WV. Plant operations are divided into the following two manufacturing units and one support services unit: Surfactants (Part 1 of 3), Polymer Additives (Part 2 of 3), and Site Services (Part 3 of 3).

The Polymer Additives Manufacturing Unit (Part 2 of 3) manufactures ultraviolet light absorbers, antioxidants and anti-static agents. The light absorbers are used in all types of plastics (bottles, telephones, lawn furniture, auto parts), in coatings, and in sunscreens. Antioxidants are used in man-made fibers, rubber products, plastics, and in medical applications. Anti-static agents are used in the electronics industry, in copy machine toner, and in textile applications.

This modification incorporates the changes approved under R13-2156X to update the Polymer Additives manufacturing unit during the second half of 2015 per semiannual reporting requirement of Section 4.5.4. This modification adds the new Product/Process Area UHX-2000 and UHX-3000 to its Polymer Additives manufacturing business within Building 82, which utilizes existing process equipment.

Emissions Summary

There is no change in potential emissions associated with this minor modification (MM01).

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs), CYTEC Industries, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR13	Preconstruction permits for minor sources.
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2156X	April 4, 2016	None

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes from R13-2156X have been incorporated in the Title V permit. These changes include the following:

- The new Product/Process Area UHX-2000 and UHX-3000 (which utilizes existing process equipment) was added to the Emission Units table.
- A typographical error was corrected in the Emission Units table.
- Reactor 2-14K2 was replaced with like-kind reactor 2-14K1.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40CFR63, Subpart FFFF—"National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (MON)"

The new "UHX-2000 and UHX-3000" manufacturing process is not subject to the Miscellaneous Organic NESHAP (MON MACT) Subpart FFFF because the process does not utilize nor emit any hazardous air pollutant.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.J.Modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.